

**IN THE UNITED STATES DISTRICT COURT
OF DISTRICT OF DELAWARE**

)	
)	
ROTHSCHILD DIGITALCONFIRMATION)	
LLC,)	
)	
Plaintiff,)	CASE NO. 19-1109-MN
)	
v.)	
)	
COMPANYCAM, INC.,)	
)	
Defendant.)	
)	

**DECLARATION OF DAVID A CHAVOUS IN SUPPORT OF ROTHSCCHILD DIGITAL
CONFIRMATION, LLC'S RESPONSE TO COMPANYCAM INC.'S SECTION 285
MOTION FOR ATTORNEYS' FEES**

I, David A. Chavous, declare as follows:

1. I am lead counsel of record for Plaintiff Rothschild Digital Confirmation, LLC. I am admitted to practice law in the state and federal courts of Massachusetts, the Federal District Court for the District of Colorado, and the United States Patent and Trademark Office. I was admitted *pro hac vice* in this matter on February 18, 2020.

2. I have personal knowledge of the facts set forth in this Declaration and am competent to testify as to the contents of this Declaration if required. I am over the age of 18.

3. On March 11, 2020, this Court held a telephonic hearing regarding motions to dismiss filed by some of the Defendants in the consolidated case. This Court indicated during that hearing its intention to file an order finding the claims invalid under Section 101. On March 19, 2020, Rothschild filed a notice of voluntary dismissal of the action against Defendant.

4. Attached hereto as Exhibit 1 is a true and accurate copy of the Amicus Curiae Brief of the Honorable Paul R. Michel (Ret.) As Amicus Curiae In Support Of Petitioners, November 1, 2019, filed in *Athena Diagnostics, Inc. v. Mayo Collaborative Services, Inc.*, No. 19-430 (2019), petition for writ of certiorari denied January 13, 2020.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: April 30, 2020

/s/ David A. Chavous
David A. Chavous

CERTIFICATE OF SERVICE

I, Stamatios Stamoulis, hereby certify that on April 30, 2020, this document was served on the persons listed below.

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/s/ Stamatios Stamoulis_____